

August 5, 2022

Hon. Allison D. Burroughs
United States District Court
One Courthouse Way
Boston, MA. 02219-3002

REF: 1:20-cr-10096

To Judge Burroughs:

After answering a question via an unexpected telephone from the court (Thursday, 6/29/2022 @ 6:50 p.m.) in preparation for Bob's upcoming hearing, I felt compelled to expand upon one of the court's questions regarding his character. Thus, I am respectfully submitting this character reference for your review.

I have known Bob for over 31 years. We met in evening graduate school at Temple University and eventually married and raised two daughters. He is incredibly generous, hard-working, persistent, loyal and conservative. He has never been involved with the law, other than perhaps a parking ticket, to my knowledge.

As a father, he has been unconditionally loving, patient, sentimental and present. Our daughters know that they are his priority. Both of them turn to Bob frequently for advice on many things. He was the quintessential definition of an involved and devoted Dad... he did the silly things, like dressing up like Elmo for birthdays, playing lions and tigers and chasing the girls all over playgrounds for hours, and sledding down neighborhood hills. More seriously, he also read books incessantly with them, taught them card games, bowling, skiing, golf, a love of sports, the value of persistence and hard work, calculus/physics/chemistry, how to write a resume and cover letter, how to handle an interview, etc. He has hosted Renée and some friends in a Dorney Park Halloween tradition since the girls were 3 or 4 years old... he alone continued hosting the tradition until the friends were in 8th grade. He spent countless hours attending our daughters' sporting events, dance recitals, science fairs, volunteering at schools and for teams, and driving them anywhere they needed to be. I do mean "anywhere"...and most recently when our eldest daughter's flight was cancelled due to the Texas ice storms over a year ago, he dropped everything to drive her 16 hours through the night, through snow and ice, to get her to her clinical shift in school the following morning with 20 minutes to spare!

Bob was NOT born with a "silver spoon", and came from a very modest background. He grew up in Queens as the son of very hard-working parents who were the offspring of immigrants. His father, a WWII veteran, went on to own and work very long hours at his small bar/restaurant on Broadway. His mother worked full-time as a secretary at Charles Pfizer, Inc.

in the early years, and later at UPS as an administrative assistant in Human Resources. Although neither attended college, they placed great value on education and sacrificed much to send Bob to Catholic school and then a 5-year pharmacy program at Rutgers University. As a first-generation college graduate, Bob recognized their sacrifice and supplemented the out-of-state tuition costs by working all through high school weekends at the crack of dawn at a floral shop making and selling funeral arrangements. In college, he first worked in the school cafeteria, and then off-loading trucks for Yellow Freight. That gift of unconditionally loving parents who worked incredibly hard was priceless. As their son, Bob has been incredibly involved and generous. He often dropped everything to respond to his parents needs especially in their later years (i.e., visiting and hosting them frequently, moving them, taking care of their many medical needs, etc.). He eventually provided a trust so they could afford to move and spend their last years (age mid-80's to early 90's) near our home in a retirement community. My daughters were blessed to follow Bob's example and were the beneficiaries of a deep loving relationship with their grandparents who were always an integral part of our family life.

In addition to helping his own parents, he selflessly agreed to help with my own extended family members, his brother, and many friends. I do not mean he helps solely financially, but rather by devoting a huge commitment of his own time. He has provided sanctuary to my niece who needed a place to stay for two years (and tuition for a trade school in Philadelphia) and for a sister who needed to escape a volatile marriage. With his blessing, we purchased a car to help another niece secure employment. For one of my younger nieces, whose father lives out-of-state, he has filled in as her adult bowling teammate in official tournaments (not to mention attending their events and hosting them often). [REDACTED]

[REDACTED] Most recently he provided hours of support by visiting them repeatedly and reviewing their medicines or clinical studies for proposed treatment plans for two friends suffering from cancer. [REDACTED]
[REDACTED]

His hands-on work ethic is truly unmatched. Bob has always worked long hours whether in the pharmaceutical industry for over 35 years, or when he exited briefly to start a beverage distribution company with a partner. When I met him, he owned and worked at that beverage company. He is incredibly humble and was never above delivering product or installing/and servicing the machines. His partner often tells the story of a college student in a cafeteria food line who turned to Bob who was installing a machine and said "You should have gone to college". Bob simply responded, "You're right. So, stay in school." Humility is ingrained in Bob... he does not brag about his success, he is grateful for our many blessings, and he does not care about the trappings of wealth.

It is difficult to describe those long hours Bob worked. He habitually arrived at work by 6:30-7:00 a.m. and almost always worked 12-hour days in spite of suffering from a rare sleep disorder (i.e., idiopathic hypersomnia). Many of his jobs involved extensive travel which often took him away from our family for lengthy periods. He sacrificed a great deal for our family and

at one point in his career, he lived during the week away from us in D.C. for almost two years. He achieved his success purely as a result of his own motivation, work ethic, tireless attention to detail, and deep personal sacrifice. He believed strongly in never burning bridges. At no point did Bob receive any handouts, nor was there ever any nepotism.

It is a testament to Bob that he has retained a large number of deep-lasting friendships, and not just from people he met through work. Two of these named him as their child's godfather... a privilege bestowed obviously because of the strength of his character. His college roommate told me several times he gives Bob full credit for teaching him how to study and thus salvaging his college degree allowing him to graduate and go on to pursue a law degree and his LLM. Although I encouraged Bob to ask friends, associates and mentees for letters of commendation, not only because he is a private person, he is also not willing to impose upon their time or involve them in this process in any way. I have personal knowledge of many of the friends and acquaintances who have repeatedly offered to write letters to the court, but Bob has refused their assistance. He also truly believes he bears responsibility for his error in judgement.

Bob has proactively altered his life as a result of this case. In spite of never requiring his pharmacy license as he did not practice as a pharmacist, he still valued the blessings it enabled, and he has continuously attended continuing education for 35+ years and retained his licenses in New Jersey and Pennsylvania. He has voluntarily placed the licenses in hold status. He resigned from his seat on the board of Biohaven, Inc. Also, with his additional free time, he joined a prior work mate volunteering hours every week at a food pantry.

Bob continues on a remorseful path of self-flagellation that never ceases; it is painful to watch. He continuously apologizes to me and both of our daughters for his error in judgement in spite of the fact that we long ago forgave him and believe it is past time for him to forgive himself. I do not doubt that his involvement is the biggest regret of his life.

If I can be of further assistance, please do not hesitate to contact me.

Respectfully,

Laurie Repella

Laurie J. Repella

